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July 24, 2008

VIA ELECTRONIC FILING

The Honorable Mary Pat Thyng
United States District Court
District of Delaware
844 N. King Street
Wilmington, DE 19801

**Re: New Century Mortgage Corp. v. Great Northern Insurance Co.,
C.A. No. 07-640-GMS**

Dear Magistrate Judge Thyng:

After having met and conferred in accordance with Your Honor's July 22, 2008 Order, the parties propose the following dates to the Court in advance of the July 29, 2008 scheduling conference

- 2. Joinder of Other Parties and Amendments of Pleadings.¹ September 26, 2008.
- 3. Discovery.
 - a. Limitation on Hours for Deposition Discovery. 25 hours per side.
 - c. Discovery Cut Off. November 28, 2008.
 - d. Disclosure of Expert Testimony:
 - (a) Initial Expert Reports due on or before December 22, 2008.
 - (b) Rebuttal reports due on or before January 22, 2009.

¹ The numbered paragraphs are taken from the Court's standard Scheduling Order in non-patent cases.



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7. Interim Status Report. Due to the Court on or before October 24, 2008.

9. Case Dispositive Motions. All case dispositive motions, briefs and affidavits in support thereof shall be submitted to the Court on or before February 27, 2009.

The parties look forward to discussing these dates with Your Honor next week. During the call, the parties will be prepared to discuss potential dates for the pre-trial conference and trial. If Your Honor should have any questions prior to our call, counsel remains available at the convenience of the Court.

Respectfully,



Chad M. Shandler (#3796)

CS:ps

cc: Clerk of the Court (by electronic filing)
Marc Stephen Casarino, Esq. (via e-mail)
Daniel J. Cunningham, Esq. (via e-mail)
Russell C. Silberglied, Esq.